

## REMARKS

Claims 1-29 are pending in the present application and stand rejected. The Examiner's reconsideration is respectfully requested in view of the following remarks.

Claims 1, 2, 5, 7, 8, 11-14, 20, 21 and 24-26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tackbary et al. (U.S. Patent No. 5,555,496) (hereinafter "Tackbary").

Claims 3, 4, 15, 27 and 28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tackbary, as applied to claims 1, 7 and 20.

Claim 6 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Tackbary, in view of Axaopoulous et al. (U.S. Patent No. 6,286,002) (hereinafter "Axaopoulous").

Claims 9, 10, 16, 22, 23 and 29 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tackbary, in view of Aalbersberg (U.S. Patent No. 5,946,678) (hereinafter "Aalbersberg").

Claims 17-19 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Tackbary, in view of Aalbersberg, as applied to claim 10, and further in view of Axaopoulous.

The rejections are respectfully traversed.

The Office Action has not addressed several claim limitations in claim 1. In particular, the Office Action has not addressed at least the following, as claimed in claim 1:

- "a server system comprising...a user profile database for storing user profiles";

- “a server system comprising...a domain model for modeling a set of views associated with product information stored in the product database, wherein said product database, the user profile database and the domain model are stored in a storage device”;
- “wherein a degree relevance is reflected for each view, the sub-categories under each view and the relevant data with respect to the user query”; and
- “the multi-view product browser maps information from each view to other views for refining said information.”

It is respectfully submitted that the Examiner must address *every* limitation to establish *prima facie* obviousness. By not showing that the prior art teaches or suggests *every* claim limitation, *prima facie* obviousness has not been established.

The Office Action also does not distinguish between a “multi-view product browser” and a “hypertext browser,” as claimed in claim 1. In fact, as clearly illustrated in Figures 4-10, a hypertext browser is *not* implemented in Tackbary.

Further, each view of the multi-view product browser, as claimed in claim 1, includes “a perspective of product data...organized under subcategories through the set of views.” Even assuming, *arguendo*, that Figure 8 (975-Religious; 985 Christmas) of Tackbary teaches or suggests “views,” the recited portion of Tackbary does not teach or suggest “a perspective of product data...organized under subcategories through the set of views.” Figure 1 of the instant application provides an *exemplary* illustration showing “views” (106) and “subcategories” (108) through a view.

Accordingly, claim 1 is believed to be patentably distinguishable over Tackbary. Dependent claims 2-6 are believed to be allowable for at least the reasons given for claim 1. Withdrawal of the claim rejections of claims 1-6 is respectfully requested.

Like claim 1, the Office Action fails to address *every* limitation of claims 7 and 20. The Office Action does not address “wherein a degree of relevance is reflected for each tab, the sub-categories under each tab, and the relevant documents with respect to the user query” and “information from each tab is mapped to other tabs for refining the relevant documents.” Thus, the Office Action has not established *prima facie* obviousness.

The Office Action seemingly misreads/misinterprets claims 7 and 20. The Office Action states that “Tackbary...does not disclose rendering searched product information in tabular form by category *and* sub-category.” Claims 7 and 20 claim, *inter alia*, “rendering a set of tabs on a user interface, each tab comprising a perspective of product data, wherein said product data is organized under sub-categories *under* each tab.” Claims 7 and 20 do not claim that sub-categories are rendered in tabular form, as the Office Action suggests. Figure 1 of the instant application provides an *exemplary* illustration of “a perspective of product data” (106) as tabs and “sub-categories” (108) *under* a tab. In any case, the recited portions of Tackbary clearly do not teach or suggest “rendering a set of tabs on a user interface, each tab comprising a perspective of product data, wherein said product data is organized under sub-categories *under* each tab,” as claimed in claims 7 and 20.

Further, the motivation to modify the teachings of Tackbary in the manner suggested by the Office Action is entirely speculative. The motivation is not expressly or impliedly found in Tackbary. One can *only* assume that the motivation to modify the teachings of Tackbary in the manner suggested by the Office Action derives from the instant application using improper hindsight reasoning. In particular, the background of

the instant application notes the problems of inefficient and ineffective product exploration solved by the claimed invention.

The Office Action relies on col. 10, lines 45-64 of Tackbary as teaching or suggesting “generating relevant documents from said product data *with respect to a user query*,” as claimed in claims 7 and 20. However, the recited portion of Tackbary does not teach or suggest a *user query* at all; instead, col. 10, lines 45-64 of Tackbary simply discloses the sorting and filtering of card images after *clicking* on a card button. (Tackbary, col. 10, lines 36-44).

Accordingly, claims 7 and 20 are believed to be patentably distinguishable over Tackbary. Dependent claims 8-17 and 21-29 are believed to be allowable for at least the reasons given for claims 7 and 20. Withdrawal of the claim rejections of claims 7-17 and 20-29 is respectfully requested.

Like claims 1, 7 and 20, the Office fails to address every limitation of claim 18. In particular, the Office Action does not address “information from each tab is mapped to other tables for refining said information,” as claimed in claim 18. Thus, the Office Action has not established *prima facie* obviousness.

The Office Action relies on several parts of Axaopoulous as teaching or suggesting “summarizing actions of each user in a user summary, wherein if the user clicks on a help button provided on the user interface, said user summary is displayed to an agent,” as claimed in claim 18. First, the Office Action relies on col. 3, lines 24-43 of Axaopoulous, which describes steps to a method of accessing a database. Second, the Office Action relies on col. 4, lines 1-22 of Axaopoulous, which describes an agent that keeps track of paths taken by users through various interests to aid *other users*. Third, the

Office Action relies on col. 16, line 18-col. 17, line 34 of Axaopoulous, which describes searching for “buy agents” and forwarding a user to another website while returning the results of any actions performed at the website to a marketplace program.

Nothing in the recited portions of Axaopoulous teach or suggest “summarizing actions of each user in *a user summary*,” as claimed in claim 18. Further, no *help* button on the user interface is taught or suggested in Axaopoulous for *displaying* the user summary to an agent, as essentially claimed in claim 18.

Once again, the motivation to combine Tackbary and Axaopoulous in the manner suggested by the Office Action is entirely speculative. Axaopoulous discloses only helping other users, *not* displaying a user summary *to an agent*. Neither Tackbary nor Axaopoulous, individually or in combination, provide a button mechanism for *helping* a user. Further, even assuming, *arguendo*, that the combination of Tackbary and Axaopoulous teach or suggest every limitation of claim 18, it is respectfully submitted that the motivation to combine such disparate reference can arise *only* from impermissible hindsight reasoning.

Accordingly, claim 18 is believed to be patentably distinguishable over Tackbary and Axaopoulous. Dependent claim 19 is believed to be allowable for at least the reasons given for claim 18. Withdrawal of the claim rejections of claims 18-19 is respectfully requested.

In view of the foregoing remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration is respectfully requested.

Respectfully submitted,

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